

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF OHIO  
3           EASTERN DIVISION  
4  
5

        IN RE NATIONAL PRESCRIPTION     | Case No. 17-MD-2804  
6                                             |  
        OPIATE LITIGATION                 | Hon. Dan A. Polster  
7                                             |  
        APPLIES TO ALL CASES             |

8  
9                                     - - -  
10           Thursday, November 15, 2018  
11                                     - - -  
12

        HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
13  
        CONFIDENTIALITY REVIEW  
14

                                   - - -

15  
16  
17  
        Videotaped deposition of JEFF ABERNATHY,  
18   held at the offices of Mitchell Williams,  
        4206 South J.B. Hunt Drive, Suite 200, Rogers,  
19   Arkansas, commencing at 9:37 a.m., on the above  
        date, before Susan D. Wasilewski, Registered  
20   Professional Reporter, Certified Realtime  
        Reporter and Certified Realtime Captioner.  
21  
22

23                                     - - -  
24           GOLKOW LITIGATION SERVICES  
        877.370.3377 ph | 917.591.5672 fax  
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<p>1 EXHIBITS 2 (Attached to transcript) 3 JEFF ABERNATHY DEPOSITION EXHIBITS PAGE 4 Walmart- E-mail - Subject: Quantity Cuts 181 Abernathy WMT_MDL_000009277 5 Exhibit 17 6 Walmart- E-mail - Subject: 405 report DC 185 Abernathy 6045- Sept. 7 Exhibit 18 WMT_MDL_000042782 and 42783 8 Walmart- E-mail - Subject: SOM web forms 188 Abernathy WMT_MDL_000016313 9 Exhibit 19 10 Walmart- E-mail - Subject: Over 20 Report 203 Abernathy WMT_MDL_000030175 through 30177 11 Exhibit 20 12 Walmart- E-mail - Subject: Over 20 Report 203 Abernathy WMT_MDL_000030184 through 30186 13 Exhibit 21 14 Walmart- Health &amp; Wellness POM Alerts Guide 212 Abernathy 3/31/2016 15 Exhibit 22 WMT_MDL_000034340 16 Walmart- E-mail - Subject: Oxy List Update 234 Abernathy WMT_MDL_000008070 and 8071 17 Exhibit 23 18 Walmart- E-mail - Subject: H&amp;W Weekly Update 254 Abernathy Week 2 19 Exhibit 24 WMT_MDL_000001004 and 1005 20 Walmart- E-mail - Subject: MCKESSON AGREES 243 Abernathy TO PAY RECORD \$150 MILLION 21 Exhibit 25 SETTLEMENT FOR FAILURE TO REPORT SUSPICIOUS ORDERS OF PHARMACEUTICAL 22 DRUGS WMT_MDL_000002729 through 2731 23 24 25</p>	<p>1 --- 2 THE VIDEOGRAPHER: We are now on the record. 3 My name is Dan Lawlor. I'm a videographer with 4 Golkow Litigation Services. Today's date is 5 November 15th, 2018, and the time is 9:37 a.m. 6 This video deposition is being held in 7 Rogers, Arkansas, in the matter of 8 National Prescription Opiate Litigation MDL 9 Number 2804. 10 The deponent today is Jeff Abernathy. The 11 counsel will be noted on the stenographic record. 12 The court reporter is Susan Wasilewski and 13 will now swear in the witness. 14 THE COURT REPORTER: Sir, would you raise 15 your right hand? 16 Do you solemnly swear or affirm the 17 testimony you're about to give will be the truth, 18 the whole truth, and nothing but the truth? 19 THE WITNESS: Yes. 20 THE COURT REPORTER: Thank you. 21 JEFF ABERNATHY, called as a witness by the 22 Plaintiffs, having been duly sworn, testified as 23 follows: 24 DIRECT EXAMINATION 25 BY MR. BOWER:</p>
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<p>1 EXHIBITS 2 (Attached to transcript) 3 JEFF ABERNATHY DEPOSITION EXHIBITS PAGE 4 5 Walmart- E-mail - Subject: Control Flow 247 Abernathy WMT_MDL_000034546 and 34547 6 Exhibit 26 7 Walmart- Drug Diversion Review Documents 261 Abernathy WMT_MDL_000045963 through 46007 8 Exhibit 27 9 Walmart- Walmart Inc.'s Amended and 257 Abernathy Supplemental Objections and 10 Exhibit 28 Responses to Plaintiffs' First Set of Interrogatories to Wal-Mart Inc. 11 Walmart- E-mail - Subject: WV call follow up 269 Abernathy WMT_MDL_000011626 through 11629 12 Exhibit 29 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 Q. Good morning, Mr. Abernathy. How are you 2 today? 3 A. Good. 4 Q. Thank you for being here. We appreciate it. 5 A. Thank you. 6 Q. Have you ever been deposed before? 7 A. No, sir. 8 Q. No, sir. So just -- before we get started, 9 let me go over a few important rules. I think the 10 most important of which is make sure you understand 11 my questions. So I would ask that at any point 12 during the day you don't understand the question, 13 will you let me know and I'll try to rephrase so you 14 understand it. 15 Do you understand that? 16 A. Yes. 17 Q. And if you don't ask me, if you don't let me 18 know, I'll expect that you do understand the 19 question. 20 A. Okay. 21 Q. Okay? And perhaps the most other important 22 rule is that you do not answer with a shaking your 23 head or a nod. You must answer verbally yes or no. 24 Okay? 25 A. Yes, sir.</p>

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1 MR. MAZZA: Mr. Bower, can I ask, are we --  
2 are we going to enter our appearances on the  
3 record?  
4 THE COURT REPORTER: They'll be noted on the  
5 stenographic record.  
6 MR. MAZZA: Okay. Thanks.  
7 BY MR. BOWER:  
8 Q. Mr. Abernathy, you understand you're under  
9 oath today, correct?  
10 A. Yes, sir.  
11 Q. Okay. Are you taking any medication or is  
12 there any other reason that would interfere with  
13 your ability to testify truthfully today?  
14 A. No.  
15 Q. Okay. Have you ever testified in any other  
16 type of legal proceeding other than a deposition?  
17 A. No.  
18 Q. How did you prepare for today's deposition?  
19 A. I met with some Walmart legal people and  
20 some outside counsel this week.  
21 Q. Who did you meet with at Walmart?  
22 A. Paul was there. There were some other --  
23 other guys that came in and out. I don't -- I don't  
24 know who they were.  
25 Q. Okay. Approximately how many people did you

Page 11

1 meet with?  
2 A. There was probably five or six people in  
3 there, most of the day.  
4 Q. Okay. Were they all attorneys, do you know?  
5 A. I believe they were.  
6 Q. Do you know whether they were or not?  
7 A. I don't know that they were. I -- I just --  
8 I assumed they were. They were counsel, is what  
9 they said, so --  
10 Q. About how long did you meet with them?  
11 A. We met about probably six hours on Tuesday  
12 and about the same amount of time on Wednesday.  
13 Q. Did you review any documents during these  
14 meetings?  
15 A. I saw a few documents.  
16 Q. Did any of those documents refresh your  
17 recollection for today's testimony?  
18 A. No, sir.  
19 Q. Do you know whether all of those documents  
20 have been produced in this litigation?  
21 A. I don't know.  
22 Q. Do you understand that to the extent that  
23 those documents were not produced, you should have  
24 brought them with you here today?  
25 MR. MAZZA: I object. I understand that

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1 there is a dispute about that, and you've been in  
2 communication with Ms. Fulmerton from our office.  
3 But I can represent that all the documents that  
4 Mr. Abernathy reviewed have been produced.  
5 MR. BOWER: Okay.  
6 BY MR. BOWER:  
7 Q. And when did you meet with outside counsel?  
8 A. During the same time.  
9 Q. Same time. Was outside counsel present for  
10 all those meetings?  
11 A. Yes, sir.  
12 Q. Other than the attorneys that sit here  
13 today, any other outside counsel that was present?  
14 A. There were some other outside counsel that,  
15 like I said, they came in and out as well.  
16 Q. Okay. So the folks who came out -- in and  
17 out were outside counsel or Walmart counsel?  
18 A. They were both.  
19 Q. Okay. Do you know the names of any of those  
20 folks?  
21 A. One of them, her name was Tina.  
22 Q. Okay. Any other names you recall?  
23 A. No, sir.  
24 Q. Can you briefly describe for us your  
25 education post high school?

Page 13

1 A. I have a bachelor's degree in finance from  
2 the University of Louisiana at Monroe.  
3 Q. What year did you graduate?  
4 A. 1997.  
5 Q. Since 1997, have you received any other  
6 educational -- formal educational training?  
7 A. No.  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 Q. Okay. So you graduated from college in  
24 1997, correct?  
25 A. Yes, sir.

Page 14

[REDACTED]

Page 16

[REDACTED]

Page 15

[REDACTED]

Page 17

[REDACTED]

Page 18

[REDACTED]

Page 20

[REDACTED]

Page 19

[REDACTED]

Page 21

[REDACTED]

Page 22

[REDACTED]

Page 24

[REDACTED]

15 Q. Sir, were you aware in 2007, that Walmart,  
16 as a distributor of controlled substances, had an  
17 obligation to monitor for suspicious orders?  
18 A. I wouldn't -- I don't know that I was aware  
19 of an obligation. We did -- we did monitor for --  
20 we did monitor orders, so --  
21 Q. Can you be more specific when you say "we  
22 did monitor orders"?  
23 A. I mean, we -- we would print 222 forms every  
24 day in this time frame. So we would pull those 222  
25 forms for however many stores we needed that day,

Page 23

[REDACTED]

Page 25

1 and we would print those 222 forms. And the ladies  
2 who were physically printing those forms, they  
3 looked at those orders; and if they saw something  
4 that maybe looked like it was kind of high, just  
5 based on their knowledge of what they were doing,  
6 they would -- they would let us know.

[REDACTED]

Page 26

[REDACTED]

Page 28

[REDACTED]

Page 27

[REDACTED]

Page 29

[REDACTED]



Page 30

[REDACTED]

Page 32

[REDACTED]

Page 31

[REDACTED]

Page 33

[REDACTED]

16 Q. Sir, were you aware that in 2007, the nation  
17 was undergoing an opioid epidemic?  
18 A. No, sir.  
19 Q. And when did you -- are you -- as you sit  
20 here today, are you aware that the nation is  
21 undergoing an opioid epidemic?  
22 A. I mean, yes, from what I've seen on TV.  
23 Q. Okay. When was the first time you became  
24 aware of it?  
25 A. I don't -- I don't know a date. I mean --

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Page 36

1 Q. Approximately?  
2 A. Probably a year or so ago.  
3 Q. Of 2017?  
4 A. 2016, like during the campaigns for  
5 presidency, you know, it seems like it came up.

A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists the demographic groups, and the x-axis shows the percentage from 0 to 100. The bars are color-coded: blue for Male and pink for Female.

Age Group	Gender	
18-29	Male	92%
	Female	95%
30-49	Male	88%
	Female	90%
50-69	Male	85%
	Female	87%
70+	Male	82%
	Female	84%

Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

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Page 37

[illegible]

Category	Should take action	Should not take action
All respondents	95%	5%
Age		
18-29	95%	5%
30-49	95%	5%
50-69	95%	5%
70+	95%	5%
Gender		
Male	95%	5%
Female	95%	5%
Education		
High school or less	95%	5%
Some college	95%	5%
Bachelor's degree	95%	5%
Graduate degree	95%	5%

Page 38

[REDACTED]

Page 40

[REDACTED]

Page 39

[REDACTED]

Page 41

[REDACTED]

Page 42

Page 44

Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	95	5
30-49	95	5
50-69	95	5
70+	95	5

23 A. So the picking folks were responsible for  
24 filling the order that came to them, yes.  
25 Q. And Walmart, in 2010, had a policy in place

A horizontal bar chart titled 'U.S. Should Take Action Against Islamic State' showing the percentage of respondents who believe the U.S. should take action against the Islamic State, categorized by age group. The y-axis lists age groups from 18-29 to 65+. The x-axis represents the percentage from 0 to 100. The bars are dark blue. The data is as follows:

Age Group	Percentage
18-29	95%
30-39	92%
40-49	89%
50-59	48%
60-64	92%
65+	75%
18-29	32%
30-39	93%
40-49	32%
50-59	70%
60-64	95%
65+	58%
18-29	98%
30-39	85%
40-49	97%
50-59	93%
60-64	88%
65+	32%
18-29	96%
30-39	98%
40-49	62%

24 MR. BOWER: Why don't we take a quick break?  
25 We've been going about an hour.

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1 where the folks who were responsible for picking the  
2 orders would also report to you if they saw anything  
3 suspicious?

4 A. I can't say that there was a policy stating  
5 that. They -- they would just do that.

1 MR. MAZZA: Okay.

2 MR. BOWER: Just like five minutes.

3 MR. MAZZA: Sure.

4 THE VIDEOGRAPHER: Going off record. The  
5 time is 10:29.

6 (Recess from 10:29 a.m. until 10:42 a.m.)

7 THE VIDEOGRAPHER: We're going back on the  
8 record, beginning of Media File Number 2. The  
9 time is 10:42.

10 BY MR. BOWER:

Age Group	Percentage of Respondents
18-29	85%
30-49	82%
50-64	80%
65+	75%

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[REDACTED]

Page 48

[REDACTED]

Page 47

[REDACTED]

Page 49

[REDACTED]

Page 50

[REDACTED]

Page 52

[REDACTED]

Page 51

[REDACTED]

Page 53

[REDACTED]

Page 54

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A horizontal bar chart titled "U.S. should take action to address climate change" showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists 16 categories, each representing a combination of age group and gender. The x-axis represents the percentage of respondents, ranging from 0% to 100%.

Category	Percentage
18-29 Male	92%
18-29 Female	92%
30-49 Male	82%
30-49 Female	72%
50-69 Male	72%
50-69 Female	72%
70+ Male	62%
70+ Female	92%
18-29 Male	92%
18-29 Female	92%
30-49 Male	92%
30-49 Female	92%
50-69 Male	82%
50-69 Female	92%
70+ Male	92%
70+ Female	92%

Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

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A horizontal bar chart titled 'U.S. should take action to protect the environment'. The y-axis lists age groups: 18-29, 30-49, 50-69, 70+, and 'All'. The x-axis represents the percentage of respondents, ranging from 0 to 100 in increments of 10. The bars show the following approximate percentages: 18-29 (85%), 30-49 (92%), 50-69 (52%), 70+ (32%), and All (88%).

Age Group	Percentage of Respondents
18-29	85%
30-49	92%
50-69	52%
70+	32%
All	88%

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 So during this time period in 2012, let's  
7 say an order for oxy 5 milligram comes in on a  
8 Monday for 51 bottles. Okay?  
9 A. For which drug?  
10 Q. Oxy 5 milligrams.  
11 A. Okay.  
12 Q. Okay? You're supposed to have a process in  
13 place, right, where you look at orders over 50,  
14 correct?  
15 A. Yes.  
16 Q. Okay. And what was the expectation as to --  
17 with respect to when that order would be filled and  
18 shipped, if the order came in on a Monday?  
19 A. So Monday morning, typically when Jimmie  
20 came in, since he was the first one in, before we  
21 started the pick process, he would pull all of those  
22 orders and export it to a spreadsheet and then we  
23 would, you know, sort those to show me orders or in  
24 the order column, show me everything over 50, show  
25 me all the oxy's over 30, and we would filter it out

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1 that way so that we could see here is all of my  
2 oxy-30s that were over 20 and here's all the other  
3 drugs that were over 50.  
4 Q. And if another dosage of oxycodone was over  
5 50, what would you do?  
6 MR. MAZZA: Object; form.  
7 Q. I'll strike that.  
8 If another order came in for another dosage  
9 of oxycodone that was not oxy-30s, it was oxy-10s or  
10 oxy-5s, that was over 50 bottles -- we're talking  
11 bottles, correct?  
12 A. Yes.  
13 Q. Okay. What would you do?  
14 A. So I guess I don't understand when you say  
15 "another order." Like the next store in line?  
16 Q. Well, let's -- let's take a step back. All  
17 right.  
18 A. Okay.  
19 Q. Go back to my first example, right. A store  
20 orders 51 bottles of oxy-5 milligrams on Monday.  
21 A. Okay.  
22 Q. The order comes in on Monday. You get your  
23 printout of that order. Then what happens?  
24 A. So then we would send that over to the team,  
25 the teams I spelled out, and we would say, "This

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1 store for this product ordered 51 bottles."  
2 Q. And from your perspective, what would happen  
3 next?  
4 A. Then we would wait. If they would send us  
5 back whatever communication or if we needed to do  
6 something with the order, we would just wait for  
7 that.  
8 Q. And how would they inform you of what to do  
9 with the order?  
10 A. E-mail.  
11 Q. And that's what happened on a daily basis,  
12 correct?  
13 A. Yes, sir.  
14 Q. During this time period, when would you have  
15 expected to hear back from them regarding what to do  
16 with the order?  
17 A. So we shipped every day at 3:00 p.m. I mean  
18 we had had discussion, that's the -- that's the time  
19 we ship. They had known that. So if we didn't hear  
20 anything back by 3:00 p.m., then we went ahead and  
21 shipped the item.  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]



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[REDACTED]

Page 64

[REDACTED]

24 A. Yes, sir.

25 Q. Okay. And at this point in the day, at

Page 63

[REDACTED]

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1 9:38 a.m., had he already reviewed that day's

2 orders?

3 A. Yes, sir.

4 Q. And he had decided to cut some orders,

5 correct?

6 A. Yes, sir.

7 Q. And he had decided to not cut other orders,

8 correct?

9 A. Yes, sir.

10 Q. Okay. Had he -- had -- strike that.

11 For the orders that he decided to cut, what

12 would be the basis for that decision?

13 MR. MAZZA: Object; foundation.

14 A. I -- I don't know. I mean --

15 Q. Well, sir, you also had -- this was also

16 your responsibility at the time period, correct?

17 A. It was my responsibility if I came in first

18 that day.

19 Q. Right. So what was the criteria for

20 cutting?

21 A. If anything over 20 bottles of oxycodone-30,

22 cut it to 20.

[REDACTED]

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[REDACTED]

Page 68

[REDACTED]

Page 67

[REDACTED]

Page 69

[REDACTED]

Page 70

[REDACTED]

Page 72

[REDACTED]

Page 71

[REDACTED]

Page 73

[REDACTED]

Page 74

[REDACTED]

Page 76

[REDACTED]

Page 75

[REDACTED]

20 Q. You weren't aware of the epidemic, correct?

21 MR. MAZZA: Objection; form.

22 A. No, sir.

[REDACTED]

Page 77

[REDACTED]

Page 78

[REDACTED]

Page 79

[REDACTED]

Page 80

[REDACTED]

2 Q. And that was because Walmart had a strict

3 policy that was based on a threshold number,

4 correct?

5 A. The direction given to me was to cut

6 anything Over 20 bottles on the 30, report anything

7 over 50 bottles of anything else.

8 Q. And therefore the direction was to not

9 report any order under 50 bottles unless it was

10 oxy-30, correct?

11 A. Not to report anything under 50 for anything

12 other than oxy-30, yes, sir.

13 Q. And when you say report, what do you mean?

14 A. To notify these people on this list.

15 Q. So it would be notify and either wait and

16 notify, and if you didn't hear anything, then to

17 ship?

18 A. To notify and wait and if I didn't hear

19 anything, I just shipped. I didn't notify that I

20 shipped it.

[REDACTED]

Page 81

[REDACTED]

Page 82

[REDACTED]

Page 84

[REDACTED]

Page 83

[REDACTED]

Page 85

[REDACTED]

Page 86

[REDACTED]

Page 88

[REDACTED]

Page 87

[REDACTED]

Page 89

[REDACTED]

Page 92

Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	95	5
30-49	95	5
50-69	95	5
70+	95	5

Page 93

A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists 14 categories, each representing a combination of age group and gender. The x-axis represents the percentage, ranging from 0% to 100%.

Category	Percentage
18-29 Male	92%
30-49 Male	88%
50-69 Male	32%
70+ Male	88%
18-29 Female	98%
30-49 Female	85%
50-69 Female	88%
70+ Female	45%
18-29 Male	35%
30-49 Male	88%
50-69 Male	95%
70+ Male	22%
18-29 Female	85%
30-49 Female	88%
50-69 Female	25%
70+ Female	95%
18-29 Male	98%
30-49 Male	68%
50-69 Male	95%
70+ Male	78%
18-29 Female	95%
30-49 Female	92%
50-69 Female	35%
70+ Female	95%
18-29 Male	92%



Page 94

Page 96

16 Q. Sir, were you aware by this time in 2013 the  
17 country was in the middle of an opioid epidemic?

18      A. No, sir.

Page 95

Page 97

Page 98

[REDACTED]

Page 100

[REDACTED]

Page 99

[REDACTED]

Page 101

[REDACTED]

Page 102

[REDACTED]

Page 103

[REDACTED]

Page 104

[REDACTED]

18 MR. MAZZA: Do you want to --

19 MR. BOWER: Let's do.

20 MR. BOWER: Can we go off the record for a

21 minute.

22 (Discussion off the record.)

23 BY MR. BOWER:

[REDACTED]

Page 105

[REDACTED]

17 Q. Sure. That's -- why don't we do this, then.

18 Why don't we take lunch now.

19 MR. MAZZA: And come back here?

20 MR. BOWER: Come back and start here since

21 it seems to be a new area.

22 THE VIDEOGRAPHER: Going off the record.

23 The time is 12:12.

24 (Recess from 12:12 p.m. until 12:53 p.m.)

25 THE VIDEOGRAPHER: We're back on the record.

Page 106

1 Beginning of Media File Number 3. The time is  
2 12:53.  
3 BY MR. BOWER:  
4 Q. We're back on the record, Mr. Abernathy.  
5 You understand you're still under oath, sir?  
6 A. Yes.

[REDACTED]

Page 107

[REDACTED]

Page 108

[REDACTED]

Page 109

[REDACTED]

Page 110

[REDACTED]

Page 112

[REDACTED]

Page 111

[REDACTED]

Page 113

[REDACTED]

Page 114

[REDACTED]

Page 116

[REDACTED]

Page 115

[REDACTED]

Page 117

[REDACTED]

Page 118

[REDACTED]

Page 120

[REDACTED]

Page 119

[REDACTED]

Page 121

[REDACTED]

Page 122

Page 124

Row	Bar Length (approx. % of total width)
1	95
2	15
3	98
4	95
5	98
6	30
7	80
8	92
9	95
10	90
11	65
12	95
13	88
14	15
15	45
16	30
17	90
18	100
19	15
20	92
21	35
22	95
23	55

24 A. For the time period that we were doing the  
25 Over 20 Report?

Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	95	5
30-49	95	5
50-69	95	5
70+	95	5

Page 123

Page 125

1 Q. Right.

2 A. We would be the ones cutting them at the DC.

3 Q. And someone --

4 A. If we were instructed to do that.

5 Q. Right.

6 And how would -- how would -- how would of

7 those -- those instructions come to you, via e-mail

8 or telephone?

9 A. E-mail.

10 Q. Do you recall an instance -- any instance

11 where you got an e-mail to cut an order?

12 A. I don't remember any given instance to --

13 that we did that.

14 Q. Do you remember that ever happening in this

15 four- to five-year time frame?

16 A. In this time frame for the Over 20 Report, I

17 don't remember -- I don't remember me getting any

18 kind of a phone call or an e-mail to cut an order.

19 Q. So you guys were running these reports daily

20 for four to five years, and you never recall

21 receiving any direction to cut an order; is that

22 correct?

23 A. I don't remember -- I don't remember getting

Category	Should take action	Should not take action
All respondents	95%	5%
Age		
18-29	95%	5%
30-49	95%	5%
50-69	95%	5%
70+	95%	5%
Gender		
Male	95%	5%
Female	95%	5%
Education		
High school or less	95%	5%
Some college	95%	5%
Bachelor's degree	95%	5%
Graduate degree	95%	5%



Page 126

[REDACTED]

Page 128

[REDACTED]

Page 127

[REDACTED]

Page 129

[REDACTED]

Page 130

[REDACTED]

Page 132

[REDACTED]

16 MR. BOWER: Why don't we just pause and go  
17 off the record for a minute and see if we can --  
18 MR. MAZZA: There are folks on the line,  
19 right?  
20 THE VIDEOGRAPHER: We're going off the  
21 record. The time is 1:38.  
22 (Recess from 1:38 p.m. until 1:43 p.m.)  
23 THE VIDEOGRAPHER: Going back on record.  
24 Beginning of Media File Number 4. The time is  
25 1:43.

Page 131

[REDACTED]

Page 133

1 BY MR. BOWER:

[REDACTED]

Page 134

[REDACTED]

Page 136

[REDACTED]

Page 135

[REDACTED]

Page 137

[REDACTED]

Page 138

1 Q. Are you familiar with any time period, based  
2 on your experience at 6045, when an order that  
3 showed up on an Over 20 Report had to wait four days  
4 before it was shipped?

5     A. For the Over 20 Report, I don't ever  
6 remember holding an order during the time frame we  
7 were using that report.

A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists the categories, and the x-axis shows the percentage from 0 to 100. The bars are color-coded: blue for Male and orange for Female. The data is as follows:

Category	Gender	Percentage
Total	Male	85%
	Female	88%
18-29	Male	92%
	Female	95%
30-49	Male	88%
	Female	90%
50-69	Male	82%
	Female	85%
70+	Male	75%
	Female	78%

Page 140

Response	Percentage
U.S. should take action	95%
U.S. should not take action	5%

Page 139

Age Group	Percentage
18	~65%
19	~80%
20	~45%
21	~100%
22	~65%
23	~80%
24	~95%
25	~15%
26	~80%
27	~30%
28	~90%
29	~85%
30	~88%
31	~95%
32	~92%
33	~60%
34	~35%
35	~90%
36	~95%
37	~45%
38	~85%
39	~100%
40	~92%
41	~95%
42	~15%
43	~30%

Page 141

Category	Should take action	Should not take action
All respondents	95%	5%
Age		
18-29	95%	5%
30-49	95%	5%
50-69	95%	5%
70+	95%	5%
Gender		
Male	95%	5%
Female	95%	5%
Education		
High school or less	95%	5%
Some college	95%	5%
Bachelor's degree	95%	5%
Graduate degree	95%	5%

Page 142

[REDACTED]

Page 144

[REDACTED]

Page 143

[REDACTED]

Page 145

[REDACTED]

Page 146

[REDACTED]

Page 148

[REDACTED]

Page 147

[REDACTED]

Page 149

[REDACTED]

Page 150

[REDACTED]

Page 152

[REDACTED]

14 Q. Did you report those orders to the DEA?

15 A. I did not.

[REDACTED]

Page 151

[REDACTED]

Page 153

[REDACTED]

Page 154

[REDACTED]

Page 156

[REDACTED]

Page 155

[REDACTED]

Page 157

[REDACTED]



Page 158

Page 160

18 MR. MAZZA: Zach, we've been going for over  
19 an hour 45. So if you want to -- whenever you  
20 are done with --  
21 MR. BOWER: Sure. That's fine. We can take  
22 a break now. I think I'm done.  
23 THE VIDEOGRAPHER: Going off the record.  
24 The time is 2:20.  
25 (Recess from 2:20 p.m. until 2:41 p.m.)

A horizontal bar chart titled "U.S. should take action to address climate change." The y-axis lists age groups: 18-29, 30-49, 50-64, 65+, and "Don't know." The x-axis shows percentages from 0% to 100% in 10% increments. For each age group, there are two bars: a blue bar for "Men" and an orange bar for "Women." The data is as follows:

Age Group	Men (%)	Women (%)
18-29	85	85
30-49	80	80
50-64	75	75
65+	65	65
Don't know	15	15

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Page 161

[illegible]

Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

Page 162

[REDACTED]

Page 164

[REDACTED]

Page 163

[REDACTED]

Page 165

[REDACTED]

Page 166

[REDACTED]

Page 168

[REDACTED]

Page 167

[REDACTED]

Page 169

[REDACTED]

Page 170

[REDACTED]

Page 172

[REDACTED]

Page 171

[REDACTED]

Page 173

[REDACTED]

1 other?  
2 A. No, sir.



Bar Index	Approximate Length (relative to longest bar)
1	0.85
2	1.00
3	0.35
4	0.65
5	0.95
6	0.40
7	0.80
8	0.25

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[illegible]

Category	Percentage
Very important	10%
Important	30%
Not important	40%
Don't know	20%

Age Group	Percentage of Respondents
18-29	85%
30-49	80%
50-64	75%
65+	65%

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Page 178

[REDACTED]

Page 180

[REDACTED] w

Page 179

[REDACTED]

Page 181

[REDACTED]

Page 182

Page 184

Response	Percentage of Respondents
U.S. should take action	95%
U.S. should take action	90%
U.S. should take action	85%
U.S. should take action	80%
U.S. should take action	75%
U.S. should take action	70%
U.S. should take action	65%
U.S. should take action	60%
U.S. should take action	55%
U.S. should take action	50%
U.S. should take action	45%
U.S. should take action	40%
U.S. should take action	35%
U.S. should take action	30%
U.S. should take action	25%
U.S. should take action	20%
U.S. should take action	15%
U.S. should take action	10%
U.S. should not take action	90%
U.S. should not take action	85%
U.S. should not take action	80%
U.S. should not take action	75%
U.S. should not take action	70%
U.S. should not take action	65%
U.S. should not take action	60%
U.S. should not take action	55%
U.S. should not take action	50%
U.S. should not take action	45%
U.S. should not take action	40%
U.S. should not take action	35%
U.S. should not take action	30%
U.S. should not take action	25%
U.S. should not take action	20%
U.S. should not take action	15%
U.S. should not take action	10%
U.S. should not take action	5%

Category	Should Take Action (%)	Should Not Take Action (%)
All respondents	85	15
Gender		
Male	86	14
Female	84	16
Age		
18-29	87	13
30-49	85	15
50-69	84	16
70+	83	17
Education		
High school or less	84	16
Some college	85	15
Bachelor's or higher	86	14

Page 183

Page 185

A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists 16 categories combining age and gender. The x-axis represents the percentage, ranging from 0% to 100%.

Age Group	Gender	Percentage
18-29	Male	~85%
18-29	Female	~95%
30-49	Male	~25%
30-49	Female	~85%
50-69	Male	~55%
50-69	Female	~25%
70+	Male	~85%
70+	Female	~15%
18-29	Male	~95%
30-49	Male	~45%
30-49	Female	~90%
50-69	Male	~100%
50-69	Female	~95%
70+	Male	~90%
70+	Female	~45%
18-29	Male	~75%
18-29	Female	~95%
30-49	Male	~15%
30-49	Female	~95%
50-69	Male	~100%
50-69	Female	~15%
70+	Male	~75%
70+	Female	~95%
18-29	Male	~95%
18-29	Female	~95%
30-49	Male	~55%
30-49	Female	~85%
50-69	Male	~95%
50-69	Female	~95%
70+	Male	~55%
70+	Female	~95%

Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

Page 186

[REDACTED]

Page 188

[REDACTED]

Page 187

[REDACTED]

Page 189

[REDACTED]



Page 190

[REDACTED]

Page 192

[REDACTED]

Page 191

[REDACTED]

Page 193

[REDACTED]

Page 194

[REDACTED]

Page 196

[REDACTED]

Page 195

[REDACTED]

Page 197

[REDACTED]

Page 198

Page 200

21 MR. MAZZA: Zach, whenever you are at a good  
22 spot.  
23 MR. BOWER: Why don't we do that, I'll  
24 digest that answer and see if I have any  
25 follow-up questions.

Page 199

Page 201

1 MR. MAZZA: I'm not trying to rush you.  
2 MR. BOWER: No. I think it is a good time  
3 because I --  
4 MR. MAZZA: Okay.  
5 THE VIDEOGRAPHER: Going off the record at  
6 3:56.  
7 (Recess from 3:56 p.m. until 4:14 p.m.)  
8 THE VIDEOGRAPHER: Going back on the record.  
9 Beginning media file number 6. The time is 4:14.

Page 202

[REDACTED]

Page 204

[REDACTED]

Page 203

[REDACTED]

Page 205

[REDACTED]

Page 206

[REDACTED]

Page 208

[REDACTED]

Page 207

[REDACTED]

Page 209

[REDACTED]

Page 210

[REDACTED]

Page 212

[REDACTED]

Page 211

[REDACTED]

Page 213

[REDACTED]

Page 214

Page 216

Category	Should take action	Should not take action
All respondents	95%	5%
Age		
18-29	95%	5%
30-49	95%	5%
50-69	95%	5%
70+	95%	5%
Gender		
Male	95%	5%
Female	95%	5%
Education		
High school or less	95%	5%
Some college	95%	5%
Bachelor's degree	95%	5%
Graduate degree	95%	5%

Response	Percentage
Yes, the U.S. should take action to address climate change	95%
No, the U.S. should not take action to address climate change	5%

Page 215

Page 217

A horizontal bar chart titled 'U.S. should take action to address climate change' showing the percentage of respondents who believe the U.S. should take action to address climate change. The chart is broken down by age group (18-29, 30-49, 50-69, 70+) and gender (Male, Female). The y-axis lists the demographic groups, and the x-axis shows the percentage from 0 to 100. The bars are colored blue for Male and orange for Female. The data is as follows:

Age Group	Gender	Percentage
18-29	Male	85%
	Female	88%
30-49	Male	82%
	Female	85%
50-69	Male	78%
	Female	80%
70+	Male	75%
	Female	78%

A horizontal bar chart titled 'U.S. should take action to protect the environment'. The y-axis lists age groups: 18-29, 30-49, 50-69, 70+, and 'All adults'. The x-axis shows percentages from 0 to 100. For each age group, there are two bars: a blue bar for 'Men' and a red bar for 'Women'. The data is as follows:

Age Group	Men (%)	Women (%)
18-29	65	75
30-49	85	80
50-69	30	85
70+	15	40
All adults	60	75

Page 218

[REDACTED]

Page 220

1 2016?

2 A. That there was a -- according to the TV,

3 that there was an epidemic.

[REDACTED]

Page 219

[REDACTED]

22 Q. At this point, were you aware of the

23 epidemic, sir?

24 A. I knew that there was an issue, yes, sir.

25 Q. What was your understanding of the issue in

Page 221

[REDACTED]



Page 222

[REDACTED]

Page 224

[REDACTED]

Page 223

[REDACTED]

Page 225

[REDACTED]

Page 226

[REDACTED]

Page 228

[REDACTED]

Page 227

[REDACTED]

Page 229

[REDACTED]

Page 230

[REDACTED]

Page 232

[REDACTED]

Page 231

[REDACTED]

Page 233

[REDACTED]

25 MR. MAZZA: Zach, if we're going to go back

Page 234

1 to the DC, now might be a good time to take a --  
2 MR. BOWER: Let's just do a little bit  
3 longer.  
4 MR. MAZZA: Yeah.  
5 MR. BOWER: A couple more before I go back  
6 to the DC.  
7 MR. MAZZA: Are you okay with that?  
8 THE WITNESS: I'm fine.  
9 BY MR. BOWER:  
10 Q. Do you want a break? We can take a break  
11 if --  
12 A. No, sir. I'm fine.  
13 Q. Okay.

[REDACTED]

Page 235

[REDACTED]

Page 236

[REDACTED]

Page 237

[REDACTED]

Page 238

[REDACTED]

Page 240

[REDACTED]

Page 239

[REDACTED]

Page 241

[REDACTED]

Page 244

Page 245

Q. Walmart had -- was doing business with McKesson at the time, right? Its pharmacies were ordering from McKesson, right?

A. Yes, sir.

Page 246

[REDACTED]

Page 248

[REDACTED]

Page 247

[REDACTED]

Page 249

[REDACTED]

Page 250

[REDACTED]

Page 252

[REDACTED]

Page 251

[REDACTED]

Page 253

[REDACTED]



Page 254

1 [REDACTED]

2 Q. In deciding whether to cut an order, you

3 never determined whether a pharmacy may have ordered

4 that same product from McKesson, did you?

5 A. No, sir.

6 Q. And you never determined whether -- you

7 never considered whether that pharmacy may have

8 ordered that product from AmerisourceBergen, did

9 you?

10 A. No, sir.

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Page 255

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Page 256

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Page 257

1 MR. BOWER: All right. Let's go off the

2 record for a minute.

3 THE VIDEOGRAPHER: Going off the record.

4 The time is 5:52.

5 (Recess from 5:52 p.m. until 5:57 p.m.)

6 THE VIDEOGRAPHER: We're back on record, the

7 beginning of Media File Number 8. The time is

8 5:57.

9 (Abernathy Exhibit 28 was marked for

10 identification.)

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

Page 258

Page 260

Age Group	Should Take Action	Should Not Take Action
18-29	95%	5%
30-49	95%	5%
50-69	95%	5%
70+	95%	5%

Age Group	Should Take Action (%)	Should Not Take Action (%)
18-29	95	5
30-49	95	5
50-69	95	5
70+	95	5

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Page 261

Group	Should take action	Should not take action
All respondents	85%	15%
Age		
18-29	88%	12%
30-49	85%	15%
50-69	82%	18%
70+	80%	20%
Gender		
Male	83%	17%
Female	87%	13%
Education		
High school or less	80%	20%
Some college	85%	15%
Bachelor's or higher	88%	12%

A horizontal bar chart titled 'U.S. should take action to protect the environment'. The y-axis lists age groups: 18-29, 30-49, 50-69, 70+, and 'All adults'. The x-axis represents the percentage of respondents, ranging from 0 to 100 in increments of 10. For each age group, there are two bars: a blue bar for 'Men' and a red bar for 'Women'. The data shows that in all age groups, a majority of respondents believe the U.S. should take action to protect the environment. The percentage is generally higher for women than for men, and higher for younger age groups than for older ones.

Age Group	Men (%)	Women (%)
18-29	88	92
30-49	85	90
50-69	82	88
70+	75	80
All adults	80	85

Page 262

[REDACTED]

Page 264

[REDACTED]

Page 263

[REDACTED]

Page 265

[REDACTED]

Page 266

Page 268

1 knowing that the drug is addictive.  
2 Q. You agree they are considered dangerous,  
3 correct?  
4 A. Yes.

Age Group	Percentage of Respondents
18-29	85%
30-49	82%
50-64	78%
65+	55%

22 MR. BOWER: I think I'm done. Let's just go  
23 off the record for a minute.

24 MR. MAZZA: Sure.

25 THE VIDEOGRAPHER: Going off the record.

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Page 269

1 The time is 6:16.  
2 (Recess from 6:16 p.m. until 6:20 p.m.)  
3 THE VIDEOGRAPHER: We're back on record,  
4 beginning Media Number 9. The time is 6:20.

19 Q. Okay. Would you agree that Schedule II  
20 drugs have a high potential for abuse?

21 A. I believe they have -- I believe personally  
22 they have a -- they can be abused.

23 Q. And what's that basis for your personal  
24 belief?

25 A. Just what I hear on TV and, you know,

Page 270

[REDACTED]

Page 272

[REDACTED]

Page 271

[REDACTED]

Page 273

[REDACTED]

Page 274

[REDACTED]

Page 276

[REDACTED]

Page 275

[REDACTED]

8 MR. BOWER: Okay. Nothing further.

9 MR. MAZZA: Okay. We can go -- let's go off

10 the record right now.

11 THE VIDEOGRAPHER: Going off record, the

12 time is 6:30.

13 (Recess from 6:30 p.m. until 6:53 p.m.)

14 THE VIDEOGRAPHER: We are going on record,

15 beginning of Media File Number 10. The time is

16 6:53.

17 CROSS-EXAMINATION

[REDACTED]

Page 277

[REDACTED]

Page 278

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

Page 279

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 MR. MAZZA: All right.  
7 THE VIDEOGRAPHER: All right. This  
8 concludes today's deposition, we're going off  
9 record. The time is 6:58.  
10 (Discussion off the record.)  
11 MR. MAZZA: We reserve the witness's  
12 signature and a pending review, and we ask that  
13 it be marked highly confidential, also pending  
14 review.  
15 (Whereupon, the deposition concluded at  
16 6:58 p.m.)  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 280

1 CERTIFICATE  
2 I, SUSAN D. WASILEWSKI, Registered  
3 Professional Reporter, Certified Realtime Reporter,  
4 and Certified Realtime Captioner, do hereby  
5 certify that, pursuant to notice, the deposition of  
6 JEFF ABERNATHY was duly taken on Thursday,  
7 November 15, 2018, at 9:37 a.m., before me.  
8 The said JEFF ABERNATHY was duly sworn by me  
9 according to law to tell the truth, the whole truth  
10 and nothing but the truth and thereupon did testify  
11 as set forth in the above transcript of testimony.  
12 The testimony was taken down stenographically by me.  
13 I do further certify that the above deposition is  
14 full, complete, and a true record of all the  
15 testimony given by the said witness, and that a  
16 review of the transcript was requested.  
17  
18  
19 Susan D. Wasilewski, RPR, CRR, CCP, CMRS, FPR, CCR  
20 (The foregoing certification of this transcript does  
21 not apply to any reproduction of the same by any  
22 means, unless under the direct control and/or  
23 supervision of the certifying reporter.)  
24  
25

Page 281

1 INSTRUCTIONS TO WITNESS  
2  
3  
4 Please read your deposition over carefully  
5 and make any necessary corrections. You should  
6 state the reason in the appropriate space on the  
7 errata sheet for any corrections that are made.  
8  
9 After doing so, please sign the errata sheet  
10 and date it. It will be attached to your  
11 deposition.  
12  
13 It is imperative that you return the  
14 original errata sheet to the deposing attorney  
15 within thirty (30) days of receipt of the deposition  
16 transcript by you. If you fail to do so, the  
17 deposition transcript may be deemed to be accurate  
18 and may be used in court.  
19  
20  
21  
22  
23  
24  
25

Page 282	Page 284
<div style="text-align: center;">-----</div> <div style="text-align: center;">ERRATA</div> <div style="text-align: center;">-----</div> <div style="text-align: center;">PAGE LINE CHANGE</div> <div style="text-align: center;"> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>1</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>2</div> <div>REASON: _____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>3</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>4</div> <div>REASON: _____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>5</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>6</div> <div>REASON: _____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>7</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>8</div> <div>REASON: _____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>9</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>10</div> <div>REASON: _____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>11</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>12</div> <div>REASON: _____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>13</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>14</div> <div>REASON: _____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>15</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>16</div> <div>REASON: _____</div> </div> <div style="display: flex; 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<div style="text-align: center;">ACKNOWLEDGMENT OF DEPONENT</div> <div style="text-align: center;"> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>1</div> <div>I, _____, do hereby</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>2</div> <div>acknowledge that I have read the foregoing pages, 1</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>3</div> <div>through 283, and that the same is a correct</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>4</div> <div>transcription of the answers given by me to the</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>5</div> <div>questions therein propounded, except for the</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>6</div> <div>corrections or changes in form or substance, if any,</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>7</div> <div>noted in the attached Errata Sheet.</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>8</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>9</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>10</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>11</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>12</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>13</div> <div>JEFF ABERNATHY                      DATE</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>14</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>15</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>16</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>17</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>18</div> <div>Subscribed and sworn to before me this</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>19</div> <div>____ day of _____, 20____.</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>20</div> <div>My Commission expires: _____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>21</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>22</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>23</div> <div>Notary Public</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>24</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between; width: 100%;"> <div>25</div> <div>_____</div> </div> </div>	